UNITED STATES DISTRICT COURT

DISTRICT OF SOUTH CAROLINA

CHARLESTON DIVISION

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|---|---|---|
| UNITED STATES OF AMERICA | ) | Case No.: 2:15-CR-236 |
| | ) | |
| | ) | MOTION FOR DISCLOSURE OF INTENT |
| vs. | ) | TO USE EVIDENCE OF OTHER CRIMES, |
| | ) | FEDERAL RULE OF EVIDENCE 404(b) |
| BENNITO ROEL VAN LEEUWAARDE | ) | |

The defendant, BENNITO ROEL VAN LEEUWAARDE, by and through his undersigned attorney, hereby moves the Court, pursuant to Federal Rule of Evidence, Rule 404(b), for an Order requiring the Government to disclose its intent to use any evidence of other crimes, wrongs, or acts as proof of motive, opportunity, intent, preparation, plan, knowledge, identity, absence of mistake, accident, or any other purpose. In this regard, the Government should specify the particular crime, wrong, or act to be used and the particular theory upon which it is admissible.

Respectfully submitted,

*/s/ Alicia Vachira Penn*

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May 1, 2015